STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

August 17, 2000

Mr. Arthur Coccoli
Code 1821 AC
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Building 95, Monitoring Event 11
Naval Air Station, Brunswick, Maine

Dear Mr. Coccoli:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Monitoring Event 11, Building 95, dated April 2000, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

General Comments:

1. This sampling report is the first of a minimum of two sample rounds that include only the two recently installed monitoring wells downgradient of former Building 95 (MW-NAB-097 and MW-NASB-098). It is understood that the Navy will interpret two rounds of data in the 2000 Annual Report for Building 95. Therefore, the Department will not comment on the meaning of the Monitoring Event 11 laboratory data before reviewing the annual report that will contain data from Event 12. (NR)

2. The Department notes with interest that, "due to laboratory error", a more complete pesticide analyte list was run, and resulted in detecting heptachlor epoxide at a concentration that exceeded its MEG of 0.04 µg/L in MW-NASB-097 water. MEDEP appreciates that the Navy included the additional compounds in this report. Event 12 analyses should include heptachlor epoxide and any other reportable contaminant. (RR)

Specific Comments:

3. Figure 2, Site Plan Building 95:

The drawing of groundwater contours where well density is light is subjective, as indicated by mostly dashed contours on this figure. It will be important for

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

web site: www.state.me.us/dep

documenting that sampling points are appropriately located so that groundwater contours are shown as accurately as possible. In the past, DEP has found that by including some of the nearest Old Fuel Farm monitoring wells (if measured on the same date) that solid contours can be shown with a higher degree of confidence. It would be prudent to utilize nearby monitoring well water elevations whether they are actually shown on the report figure. In doing so, please add a footnote to this effect. (RR)

4. Table 3 (Summary of water quality indicator parameters):

   The Department again notes that the dissolved oxygen content in groundwater from both wells is very low (less than 1 mg/L). See MEDEP's comment 6 dated March 5, 1999, for Monitoring Event 10. (NR)

5. The field record of well gauging, purging, and sampling for MW-NASB-097 indicates that the minimum purge rate achievable was 1.2 L/minute. This rate far exceeds that required for low-flow sampling (~0.3 L/min). The Navy should find a means of reducing the flow to acceptable rates prior to Event 12. (RR)

6. The high iron content (4100 & 4530 µg/L) in the sample water from MW-NASB-98 is supported by the observation that the purged water color was initially orange. Six well volumes were removed from the well at 0.2 L/minute. The pH was also quite low at 5.07. As a whole, the DO and pH values suggest that shallow groundwater downgradient of the site is of general poor quality. (RR)

Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,

Claudia Sait

Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: File
Larry Dearborn-DEP
Anthony Williams-BNAS
Michael Barry-EPA
Carolyn LePage-LePage Environmental
Al Easterday-EA
Ed Benedikt